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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WHITNEY MITCHELL,

Plaintiff,

v.

AUTO MART LLC and RIGHT-NOW
RECOVERY LLC,

Defendants.

Case No.: 2:21-cv-00020-JAD-EJY

**AMENDED STIPULATION AND ORDER
TO EXTEND DEADLINE FOR
DEFENDANT, RIGHT-NOW-
RECOVERY, LLC TO FILE RESPONSE
IN OPPOSITION TO PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT**

(First Request) ECF No. 25

COME NOW, Plaintiff, WHITNEY MITCHELL ("Plaintiff") and Defendant, RIGHT-NOW-RECOVERY, LLC, a Florida limited liability company ("Defendant"), by and through their undersigned counsel, and hereby stipulate to the following:

1. On November 18, 2021, Defendant's Response to Plaintiff's Motion for Summary Judgment was due.

2. After conferring, counsel agreed that Defendant would have an additional ten (10) days to file its Response to Plaintiff's Motion for Summary Judgment, making the new deadline per stipulation of the parties, November 28, 2021.

3. The reason proffered by Defendant's lead counsel, Ms. Smallwood Miranda, and acquiesced to by Plaintiff's counsel, was the recent unexpected relocation and placement by child services of her five year old great-nephew into her home, and a subsequent illness that kept counsel out of the office for the three weeks prior to the deadline set by this Honorable Court.

The extension requested is the first request and is made in good faith and is not for the purpose of delay.

IT IS SO STIPULATED.

Dated this 22nd day of November, 2021.

Dated this 22nd day of November, 2021.

SMALLWOOD MIRANDA LAW, INC.

KIND LAW

By: /s/ Christine D. Smallwood Miranda
Christine D. Smallwood Miranda, Esq.
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By: /s/ Michael Kind
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ORDER

IT IS SO ORDERED dated this 24th day of November, 2021.
nunc pro tunc to 11/18/2021


UNITED STATES DISTRICT JUDGE